MINOR SOURCE OPERATING PERMIT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AND
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Best Access Systems
6161 E. 75th Street
Indianapolis, Indiana 46250

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-11708-00119	
Issued by: Original Signed by John B, Chavez John B. Chavez, Administrator Indianapolis Office of Environmental Services	Issuance Date: September 22, 2003 Expiration Date: September 22, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary decorative chromium plating operation.

Authorized Individual:	Lloyd Patterson, Plant Manager
Source Address:	6161 East 75th Street, Indianapolis, Indiana, 46250
Mailing Address:	P.O. Box 50444, Indianapolis, Indiana, 46250
Phone Number:	(317)849-2250
SIC Code:	3429
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, Section 112 of the Clean Air Act Minor Source under PSD Rules

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) decorative chromium electroplating operation consisting of one (1) decorative chromium electroplating tank, identified as U3, using a hexavalent chromium bath, equipped with a packed-bed scrubber (PBS) and composite mesh-pad (CMP) system as chromium control, with maximum rectifier capacity of 2,000 amps and a maximum cumulative rectifier capacity of 11,760,000 amp-hours, exhausting to stack S1;

(b) One (1) natural gas fueled boiler, maximum heat input rate of 2.4 MMBtu per hour, identified as 3000 boiler room;

(c) One (1) natural gas fueled boiler, maximum heat input rate of 2.4 MMBtu per hour, identified as old 3000 boiler room;

(d) One (1) natural gas fueled boiler, maximum heat input rate of 2.4 MMBtu per hour, identified as Plating 1000.

(e) One (1) natural gas fueled boiler, maximum heat input rate of 1.5 MMBtu per hour, identified as 1000 Boiler Room;

(f) Three (3) natural gas fueled water heaters, maximum heat input rate of 1.0 MMBtu per hour, identified as Restrooms;

(g) One (1) natural gas fueled water heating drying process, maximum heat input rate of 3.5 MMBtu per hour, identified as Power Coat Line;

(h) Twenty-two (22) natural gas fueled space heating units, maximum heat input rate of 2.5 MMBtu per hour, identified as HV/AC Units;

(i) Four (4) natural gas fueled air make up units, maximum heat input rate of 10 MMBtu per hour, identified as Hartzell Units;

(j) Two (2) natural gas fueled electric generators, with an output rate of 280 KW each, identified as Generator-1 and Generator-2;

(k) One (1) buffing/sanding/polishing operation, identified as U2, using brass, bronze and steel barstock as raw material, with an input rate of 693 lb/hr, and twenty (20) dust collectors, identified as Dust Collector-1;

(l) One (1) cold cleaner degreasing operation, identified as U1, consisting of thirty (30) cold cleaner degreasing dip tanks, without a remote solvent reservoir, utilizing 5,200 gallons of mineral spirits a year;

(m) One (1) multigraphics 1360 offset printing press operation, identified as U7;

(n) One (1) electrostatic surface coating spray booth, coating brass locks and booth wells, identified as U5, using dry filters as control, exhausting to stack S3;

(o) One (1) inert gas welding/flame-cutting operation, welding consuming a maximum of 0.06 lbs of wire per hour, flame cutting utilizing oxygen acetylene with a maximum metal thickness of 1 1/8 inch and 2 inches per minute, identified as welding/flame cutting-#1;

(p) One (1) nickel plating operation, identified as U4, consisting of one (1) nickel plate tank with an input rate of 2.89 lb/hr, equipped with a wet scrubber/evaporator as control, and exhausting to stack S2.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Revocation [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2-6.1-6]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the IDEM, Office of Air Quality (OAQ) and

Indianapolis Office of Environmental Services (OES) stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The first annual notification shall cover the time period from the issuance date of this permit to December 31 of the year in which the permit is issued, subsequent annual notifications shall cover a time period from January 1 to December 31 of the previous year in the format attached to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015,

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The annual notifications shall be submitted no later than 30 days after the end of the previous year.

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.9 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.10 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a source is located, or emissions related activity

is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.11 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to 326 IAC 2-6.1-6(d)(3):

(a) In the event that ownership of this source is changed, the Permittee shall notify OES within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.12 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone number: 317-327-2234, to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, and U.S. EPA or an authorized representative to perform the following:

(a) Enter, at reasonable times during normal business hours, upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times during normal business hours, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times during normal business hours, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times during normal business hours, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements (Permittee shall be provided with the opportunity to split samples upon the request of the Permittee made prior to the sampling event.); and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements at reasonable times during normal business hours (Permittee shall be provided with results of any testing upon the request of the Permittee).

C.2 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, Air Permits within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.3 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the OAQ Administrator at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

Testing Requirements

C.6 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within sixty (60) days after achieving maximum production rate, but no later than one hundred eighty (180) days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and OES.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify the IDEM, OAQ and OES of the actual test date at least fourteen (14) days prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES no later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ and OES, if the source submits to IDEM, OAQ and OES a reasonable written explanation no later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The administrator may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented immediately after the permit issuance.

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and OES, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ and OES reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the IDEM, OAQ and OES or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ and OES using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner [326 IAC 1-2-39].

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the IDEM Commissioner and/or OES Administrator make a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or Administrator within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-5]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

(c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.14 Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall indicate estimated actual emissions of criteria pollutants from the source,

in compliance with 326 IAC 2-6 (Emission Reporting). The submittal shall cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Chromium Electroplating Operations
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(a) One (1) decorative chromium electroplating operation consisting of one (1) decorative chromium electroplating tank, identified as U3, using a hexavalent chromium bath, equipped with a packed-bed scrubber (PBS) and composite mesh-pad (CMP) system as chromium control, with maximum rectifier capacity of 2,000 amps and a maximum cumulative rectifier capacity of 11,760,000 amp-hours, exhausting to stack S1.

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N. The Permittee shall comply with the requirements of this condition on and after the compliance date for the tanks.

D.1.2 Chromium Electroplating NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to the Tank U3. The Permittee shall comply with the requirements of this condition on and after the compliance date for the tanks.

D.1.3 Chromium Emissions Limitation [40 CFR 63.342(b)&(d)] [40 CFR 63.343(a(1)&(2)] [40 CFR 63.343(c)(1)&(3] [326 IAC 20-8-1]

a. The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for the tank subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.

b. During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the Tank U3 by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.01 mg/dscm ($4.4x10^{-6}$ gr/dscf).

D.1.4 Work Practice Standards [40 CFR 63.342(f)] [326 IAC 20-8-1]

The following work practice standards apply to tank U3:

(a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain the Tank U3, PBS/CMP system, and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.6.

(b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.6.

(c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.

(d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ, and OES which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection

of the source.

(e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAQ and OES may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAQ and OES finds that the plan:

(1) Does not address a malfunction or period of excess emissions that has occurred;

(2) Fails to provide for the operation of the Tank U3, PBS/CMP system, and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or

(3) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control equipment, or monitoring equipment or other causes of excess emissions as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP), in accordance with Condition B.8 Preventive Maintenance Plan of this permit, is required for the Tank U3 and the PBS/CMP system.

D.1.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)] [326 IAC 20-8-1]

(a) The Permittee shall prepare an Operation and Maintenance Plan (OMP), in accordance with 40 CFR 63.342(f)(3) to be implemented no later than the compliance date of tank U3. The OMP shall specify the operation and maintenance criteria for the tank, the PBS/CMP system, and monitoring equipment, and shall include the following elements:

(1) Visual inspections of the PBS/CMP system to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device - once per quarter;

(2) Visual inspections of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist - once per quarter;

(3) Visual inspections of the ductwork from tank to the PBS/CMP mist eliminator to ensure there are no leaks - once per quarter;

(4) Washdown of the composite mesh pads in accordance with manufacturer's recommendations;

(5) Manufacturers recommendations for maintenance of the monitoring equipment used to measure the PBS/CMP system overall pressure drop;

(6) A standardized checklist to document the operation and maintenance criteria for the tank, PBS/CMP system, and monitoring equipment;

(7) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur;

(8) A systematic procedure for identifying malfunctions and periods of excess emissions of the tank, PBS/CMP system, and monitoring equipment; and for implementing corrective actions to address such malfunctions.

(b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.1.5, the OMP, provided the alternative plans meet the above listed criteria in Condition D.1.6(a).

(i) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining the tank, PBS/CMP system, and the monitoring equipment, during similar malfunction or excess emissions events, and a program for corrective action for such events.

(j) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ, and OES.

(k) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ, and OES for the life of the tank or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous (i.e., superseded) versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ, and OES for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.7 Performance Testing [326 IAC 2-1.1-11] [326 IAC 20-8-1]

(a) The Permittee is not required to further test the Tank U3 by this permit. However, the IDEM and OES may require testing when necessary to determine if the tank is in compliance. If testing is required by the IDEM and OES, compliance with the limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C.9 - Performance Testing.

(b) Any change, modification, or reconstruction of the Tank U3, the PBS/CMP system, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C.9 - Performance Testing.

D.1.8 Establishing Site-Specific Operating Parameter Values [40 CFR 63.343(c)(3)] [40 CFR 63.344(d)] [326IAC 20-8-1]

The Permittee shall establish as a site-specific operating parameter the pressure drop across the Composite mesh-pad system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in 40 CFR 63.344(d)(5). The Permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test and accept ±1 inch of water column from this value as the compliant range.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.9 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-6.1-5(a)(2)] [326 IAC 20-8-1]

(a) Pursuant to 40 CFR 63.343(c)(1)(ii) and 40 CFR 63.343(c)(3) for PBS/CMP system, the

Permittee shall monitor and record the pressure drop across the CMP system once each day that the Tank U3 is in operation. To be in compliance with the standards, the CMP system shall be operated within 0.9 ± 1 inches of water column of the pressure drop value, or at a value, established as acceptable during the most recent performance test.

(b) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts may be considered operating time.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.10 Record Keeping Requirements [40 CFR 63.346] [326 IAC 20-8-1]

The Permittee shall maintain records to document compliance with Conditions D.1.3, D.1.4 and D.1.6. These records shall be maintained in accordance with Section C.15 - General Record Keeping Requirements of this permit and include a minimum of the following:

(a) Records of monitoring data required by 40 CFR 63.343(c), as defined in Condition D.1.9, that are used to demonstrate compliance with the standard, including the date and time the data are collected.

(b) Records of all maintenance performed on the Tank U3 and monitoring equipment.

(c) Records of the occurrence, duration, and cause (if known) of each malfunction of the Tank U3, add-on air control equipment and monitoring equipment.

(d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions rather than malfunction of the Tank U3, add-on air control equipment and monitoring equipment as indicated by monitoring data collected in accordance with this condition.

(e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.

(f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.

(g) Test reports documenting results of all performance tests.

(h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.

(i) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.11.

D.1.11 Reporting Requirements [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345, 63.347] [326 IAC 20-8-1]

The notifications and reports required in this section shall be submitted to IDEM, OAQ and OES using the address specified in Section C.16 - General Reporting Requirements.

(a) Notifications:

(1) Initial Notifications

The Permittee shall notify IDEM, OAQ and OES in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one

hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).

(2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

(A) The NCS shall be submitted to IDEM, OAQ, and OES and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).

(B) The NCS for the Tank U3 shall be submitted to IDEM, OAQ, and OES immediately.

(3) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including reconstruction of non-affected tanks such that they become an affected source subject to Subpart N) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ and OES. In addition, the Permittee may not change, modify, or reconstruct the Tank U3 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ or OES.

(A) The NCR shall contain the information identified in 40 CFR 63.345(b) (2) and (3), as applicable.

(B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both the existing tank and non-affected facilities by a common control technique or device.

(C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct the Tank U3 serves as this notification.

(D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ and OES before construction, modification, or reconstruction may commence, unless it is subject to exemption pursuant to 326 IAC 2-1.1-3.

(b) Performance Test Results
The Permittee shall document results from any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).

The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, described in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.

(c) Ongoing Compliance Status Report
The Permittee shall prepare summary reports to document the ongoing compliance status of the Tank U3 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because Chrome tank 1 is located at a site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ and OES upon request.

(1) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided in paragraphs (c)(2).

(A) The first report shall cover the period from the issuance date of their permit to December 31 of the year in which the permit is issued, and shall be completed no later than 30 days after the end of a reporting period.

(B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31, and shall completed no later than 30 days after the end of a reporting period.

(2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, OAQ and OES:

(A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.9(b) for the reporting period; or

(B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.1.9(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

(3) IDEM, OAQ and OES may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITION

Facility Description [326 IAC 2-7-5(15)]:
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(b) One (1) natural gas fueled boiler, maximum heat input rate of 2.4 MMBTU per hour, identified as 3000 boiler room;

(c) One (1) natural gas fueled boiler, maximum heat input rate of 2.4 MMBtu per hour, identified as old 3000 boiler room;

(d) One (1) natural gas fueled boiler, maximum heat input rate of 2.4 MMBtu per hour, identified as Plating 1000.

(e) One (1) natural gas fueled boiler, maximum heat input rate of 1.5 MMBtu per hour, identified as 1000 Boiler Room;

(f) Three (3) natural gas fueled water heaters, maximum heat input rate of 1.0 MMBtu per hour, identified as Restrooms;

(g) One (1) natural gas fueled water heating drying process, maximum heat input rate of 3.5 MMBtu per hour, identified as Power Coat Line;

(h) Twenty-two (22) natural gas fueled space heating units, maximum heat input rate of 2.5 MMBtu per hour, identified as HV/AC Units;

(i) Four (4) natural gas fueled air make up units, maximum heat input rate of 10 MMBtu per hour, identified as Hartzell Units.

(j) Two (2) natural gas fueled electric generators, with an output rate of 280 KW each, identified as Generator-1and Generator-2, exhausting to stack S4.

Emission Limitations and Standards

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-2(a)]

Pursuant to 326 IAC 6-2-2(a) (Particulate Emission Limitations for sources of Indirect Heating), PM emissions from Boilers 3000, Old 3000, Plating 1000, and 1000 Boiler Room each shall be limited to 0.517 pounds per MMBtu heat input.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test any of the emissions units described in Section D.2 by this permit. However, IDEM and OES may require compliance testing when necessary to determine if the emissions units are in compliance. If testing of 3000 Boiler Room, Old 3000, Plating 1000, and 1000 Boiler Room is required by IDEM or OES, compliance with the particulate limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C.9 - Performance Testing.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(k) One (1) buffing/sanding/polishing operation, identified as U2, using brass, bronze and steel barstock as raw material, with an input rate of 693 lb/hr**.** PM emissions are controlled by twenty (20) dust collectors, identified as Dust Collector-1;

(n) One (1) electrostatic surface coating spray booth, coating brass locks and booth wells, identified as U5, using dry filters as control, exhausting to stack S3;

(o) One (1) inert gas welding/flame-cutting operation, welding consuming a maximum of 0.06 lbs of wire per hour, flame cutting utilizing oxygen acetylene with a maximum metal thickness of 1 1/8 inch and 2 inches per minute, identified as welding/flame cutting-#1.

Emission Limitations and Standards

D.3.1 Particulate [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3-2(c) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the buffing/sanding/polishing operation, inert gas welding/flame-cutting operation, and spray booth each shall not exceed the 2.02 pounds per hour when operating at a process weight rate of 693 pounds per hour.

The pounds per hour limitation was calculated using the following equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour.

(b) The dust collectors, identified as Dust Collector-1, shall be in operation at all times when buffing/sanding/polishing equipment is in operation.

D.3.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), emissions from the surface coating operation in the electrostatic surface coating spray booth, identified as U5, shall be controlled by a dry particulate filter, subject to the following:

(a) The source shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground. If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so

that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.3.3 VOC Emissions [326 IAC 8-2-9]

Any change or modification which would increase the electrostatic surface coating spray booth, identified as U5, actual emissions of VOC to greater than 15 (fifteen) pounds per day, shall obtain prior approval from OAQ and OES, and shall be subject to the requirements of 326 IAC 8-2-9.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.3.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emissions units by this permit. However, IDEM and OES may require compliance testing when necessary to determine if the emissions units are in compliance. If testing is required by IDEM or OES, compliance with the particulate limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C.9 - Performance Testing.

Record Keeping Requirements [326 IAC 2-6.1-5(a)(2)]

D.3.5 Record Keeping Requirements [326 IAC 2-6.1-5(a)(2)]

The Permittee shall maintain records of coatings throughput and VOC content to document compliance with Condition D.3.3. These records shall be maintained in accordance with Section C.15 - General Record Keeping Requirements of this permit.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(l) One (1) cold cleaner degreasing operation, identified as U1, consisting of thirty (30) cold cleaner degreasing dip tanks, without a remote solvent reservoir, utilizing 5,200 gallons of mineral spirits a year.

Emission Limitations and Standards

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreasers with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreasers with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreasers with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreasers.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(m) One (1) Multigraphics 1360 offset printing press operation, identified as U7;

(p) One (1) nickel plating operation, identified as U4, consisting of one (1) nickel plate tank with an input rate of 2.89 lb/hr, equipped with a wet scrubber/evaporator as control, and exhausting to stack S2.

Emission Limitations and Standards

D.5.1 VOC Emissions [326 IAC 8-1-6]

Any change or modification which would increase the multigraphics 1360 offset printing press operation, identified as U7, potential emissions of VOC to greater than 25 (twenty five) tons per year, shall obtain prior approval from OAQ and OES, and shall be subject to the requirements of 326 IAC 8-1-6.

Record Keeping Requirements [326 IAC 2-6.1-5(a)(2)]

D.5.2 Record Keeping Requirements [326 IAC 2-6.1-5(a)(2)]

The Permittee shall maintain records of printing operation materials throughput and VOC content to document compliance with Condition D.5.1. These records shall be maintained in accordance with Section C.13 - General Record Keeping Requirements of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
INDIANAPOLIS OFFICE OF AIR QUALITY
AIR COMPLIANCE

MINOR SOURCE OPERATING PERMIT
CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT

PAGE 1 OF 2

Source Name: Best Access Systems
Source Address: 6161 East 75th Street, Indianapolis., IN
Mailing Address: 6161 East 75th Street, Indianapolis., IN
Minor Source Operating Permit No.: 097-11708-00119

Tank ID #: U3
Type of process: Decorative
Monitoring Parameter: Pressure drop across composite mesh-pad system
Parameter Value: 0.9±1 inches of water column
Limits: Total chromium concentration may not exceed 0.01 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.
The frequency for completing this report may be altered by the IDEM, OAQ, Compliance Branch or the OES.

Complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:
TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:
MAJOR AND AREA SOURCES: CHECK ONE
9 NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
9 THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY:
IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.

JAN	APR	JCL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY:
LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.

JAN	APR	JCL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

Page 2 of 2

CHECK IF EITHER OR BOTH CONDITIONS WERE MET DURING THE REPORTING PERIOD:

9 the total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.9(b) for the reporting period, or:

9 the total duration of malfunctions of add-on pollution control device and monitoring equipment is 5 percent (5%) or greater of the total operating time as defined in Condition D.1.9(b) for the reporting period.

ATTACH A SEPARATE PAGE IF NEEDED

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:
DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:
ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE	
9	I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.
9	THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Best Access Systems**
Address:	**6161 East 75th Street**
City:	**Indianapolis, Indiana 46250**
Phone #:	**(317) 849-2250**
MSOP #:	**097-11708-00119**

I hereby certify that Best Access Systems is

9 still in operation.
9 no longer in operation.

I hereby certify that Best Access Systems is

9 in compliance with the requirements of MSOP 097-11708-00119.
9 not in compliance with the requirements of MSOP 097-11708-00119.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE
FAX NUMBER - 317 327-2234

MALFUNCTION REPORT

PAGE 1 OF 2

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____
MEASURES TAKEN TO MINIMIZE
EMISSIONS:_____

_____
REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)
MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

PAGE 2 OF 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services

Addendum to the
Technical Support Document (TSD) for a Minor Source Operating Permit

Source Name: **Best Access Systems**
Source Location: **6161 E. 75th Street, Indianapolis, IN. 46250**
County: **Marion**
SIC Code: **3429, 3471**
Operation Permit No.: **097-11708-00119**
Permit Reviewer: **Boris Gorlin**

On April 17, 2003, the Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that the Best Access Systems had applied for a Minor Source Operating Permit to operate a manufacturing lock hardware, specifically the decorative chrome electroplating process. The notice also stated that the OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The TSD will remain as it originally appeared when published. The Indiana Department of Environmental Management, Office of Air Quality (OAQ) and OES prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision (language in bold has been added, the language with a line through it has been deleted). The Table of Contents and numbering have been revised, as needed.

Written comments and additional source information were received from the Applicant (Best Access Systems) on May 20, 2003 and July 21, 2003. These comments and OES responses, including changes to the permit, are as follows.

Comment 1:

Page 12. C.8 Opacity. There is a typographical error here. The term says that opacity should not exceed an average of forty percent, but the parenthetical following the forty percent says (30%). Page 6 of the Technical Support Document states that opacity should not exceed thirty percent (30%). 30% appears to be the right number.

Response 1:

The typographical error was corrected. The following change was made to the Condition C.5 (formerly - Condition C.8):

C.5 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of ~~forty~~ **thirty** percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

Comment 2:

Page 14. C.14. The terms and conditions are unclear as they relate to startups and shutdowns. Subsection (a) includes startups and shutdowns in its requirements for malfunction, but (b) and (c) do not have any language dealing with startup and shutdowns. Further the rule definition (IAC 1-2-39) and term (d) define malfunction in a way that cannot include startups and shutdowns.

Response 2:

The reference to "all malfunctions, including startups or shutdowns of any facility or emission control equipment" in Condition C.11(a) [formerly Condition 14(a)] does not contradict the definition of malfunction by 326 IAC 1-2-39, because "any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment" may happen during both normal operation hours and periods of startups and shutdowns. According to Condition C.11(b), malfunctions which last more than one (1) hour must be reported to OAQ and OES, records of all other malfunctions (including periods of startups and shutdowns if they last less than one (1) hour), must be kept and retained at the source, according to Condition C.11(a). No changes were made to the permit.

Comment 3:

Page 22.D.2.1. This term lists both 326 IAC 6-2-2(a) and 326 IAC 6-2-4 as applicable rules. However, it appears that 326 IAC 6-2-2(a) does not apply.

Response 3:

The four (4) natural gas boilers were constructed prior to September 21, 1983 in Marion County. Therefore, according to 326 IAC 6-2-1(b), they are subject to 326 IAC 6-2-2. The following changes were made to Permit Condition D.2.1:

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-2(a)] ~~[326 IAC 6-2-4]~~

Pursuant to 326 IAC 6-2-2(a) ~~and 326 IAC 6-2-4~~ (Particulate Emission Limitations for sources of Indirect Heating), ~~particulate matter (PM)~~ **PM** emissions from Boilers 3000, Old 3000, Plating 1000, and 1000 Boiler Room each shall be limited to 0.517 pounds per MMBtu heat input.

Comment 4:

Page 22, condition D.2.1. This provision limits particulate emissions from the boilers to 0.517 lb/MMBtu heat input, but Page 10, condition C.2 limits particulate emissions at each unit facility wide to 0.551 lbs/hr unless the source is regulated by an NSPS or 326 IAC 6-1. I know that you want to measure particulate from the boilers based on lb/MMBtu instead of lb/hr, so the language needs to be clarified so that it is clear that the lb/hr limits do not apply to the boilers (unless the lb/hr limit is based on the lb/MMBtu limit at 0.551).

Page 23. D.3.1. Again, similar comment to the one above. This source has a 2.02 lb/hr particulate limit and it is a processing source. Language should be added to clarify that the Page 10 requirements do not apply to this source.

Response 4:

Condition C.2 (Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is mandatory for counties not listed in 326 IAC 6.1 (Nonattainment Area Limitations). Marion County is listed in Condition 326 IAC 6.1-1, therefore Condition C.2 does not apply to this source. This condition **was deleted**, the subsequent Section C conditions were renumbered, respective changes were made to the Table of Contents.

Comment 5:

Page 25.D.4.1. This unit has requirements based on the fact that it was installed after Jan. 1. 1980. The record seems to indicate an installation date prior to Jan 1, 1980. If so, the requirements should be removed.

The cold parts stripping operation (EU Stripping #1) has been removed.

Response 5:

According to 326 IAC 8-3-1(a), organic solvent degreasing operations existing as of January 1, 1980, in Marion County, are subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations: applicability) if located at sources which have potential emissions of 100 tons per year of VOC. This source has total VOC potential emission less than 100 tons per year, and the Cold Cleaner Degreasing Operation, identified as U1, was constructed prior to January 1, 1980. Therefore, it is not subject to 326 IAC 8-3-1(a)(1) and (2). However, according to 326 IAC 8-3-1(b)(1)(A), as a cold cleaner degreasers operation without remote solvent reservoir, existing as of July 1, 1990 in Marion County, emission unit U1 is subject to requirements of 326 IAC 8-3-5.

The following changes were made to Permit condition A.2 and Section D.4:

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(l) One (1) cold cleaner degreasing operation, identified as U1, consisting of thirty (30) cold cleaner degreasing dip tanks, without a remote solvent reservoir, utilizing 5200 gallons of mineral spirits a year**.**

~~(m) One (1) cold parts stripping operation, identified as Stripping #1, utilizing 425 lbs/year of Oakite Stripper, exhausting to stack S4.~~

Emission Limitations and Standards

~~D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]~~

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:~~

~~(a) Equip the cleaner with a cover;~~

~~(b) Equip the cleaner with a emissions unit for draining cleaned parts;~~

~~(c) Close the degreaser cover whenever parts are not being handled in the cleaner;~~

~~(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~

~~(e) Provide a permanent, conspicuous label summarizing the operation requirements;~~

~~(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

D.4.~~2~~**1** Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs, ~~constructed after July 1, 1990,~~ existing as of July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

.....

Comment 7:
Due to the delay in issuing our permit or replying to comments submitted on September 22, 2000, from the original draft permit, the information for emission units and pollution control equipment is not up to date. Certain process changes have been made from the time of our original submission (Application Forms F-1 and Q-1 attached):

(a) three (3) dust collectors added to buffing/sanding/polishing operation;

(b) a second emergency generator, similar to the existing natural gas generator, was added.

Response 7:

Addition of the second natural gas emergency generator (identified as Generator-2) will result in NOx potential emissions increase of 4.060 tons per year; the sourcewide total will be 14.360 tons per year. See revised Emission Calculation spreadsheets - TSD Addendum Appendix A (3 pages).

The following changes were made to Permit conditions A.2, D.2, and D.3.

.....

~~(k)~~**(j)** ~~One (1)~~ Two (2) natural gas fueled electric generator**s**, with an output rate of ~~112 H.P.~~ **280 KW each**, identified as Generator-1**and Generator-2**;

~~(j)~~**(k)** One (1) buffing/sanding/polishing operation, identified as U2, using brass, bronze and steel barstock as raw material, with an input rate of 693 lb/hr**.** PM emissions are controlled by ~~and seventeen (17)~~ **twenty (20)** dust collectors ~~as control~~, identified as Dust Collector-1;

(l) One (1) cold cleaner degreasing operation, identified as U1, consisting of thirty (30) cold cleaner degreasing dip tanks, without a remote solvent reservoir, utilizing 5,200 gallons of mineral spirits a year;

~~(m) One (1) cold parts stripping operation, identified as Stripping #1, utilizing 425 lbs/year of Oakite Stripper, exhausting to stack S4.~~

~~(n)~~**(m)** One (1) multigraphics 1360 offset printing press operation, identified as U7;

~~(o)~~**(n)** One (1) electrostatic surface coating spray booth, coating brass locks and booth wells, identified as U5, using dry filters as control, exhausting to stack S3;

~~(p)~~**(o)** One (1) inert gas welding/flame-cutting operation, welding consuming a maximum of 0.06 lbs of wire per hour, flame cutting utilizing oxygen acetylene with a maximum metal thickness of 1 1/8 inch and 2 inches per minute, identified as welding/flame cutting-#1;

~~(q)~~**(p)** One (1) nickel plating operation, identified as U4, consisting of one (1) nickel plate tank with an input rate of 2.89 lb/hr, equipped with a wet scrubber/evaporator as control, and exhausting to stack S2.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITION

Facility Description [326 IAC 2-7-5(15)]:
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)
.....

(j) **Two (2) natural gas fueled electric generators, with an output rate of 280 KW each, identified as Generator-1 and Generator-2, exhausting to stack S4;**

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(k) One (1) buffing/sanding/polishing operation, identified as U2, using brass, bronze and steel barstock as raw material, with an input rate of 693 lb/hr**.** PM emissions are controlled by ~~and seventeen (17)~~ **twenty (20)** dust collectors ~~as control~~, identified as Dust Collector-1;

(n) One (1) electrostatic surface coating spray booth, coating brass locks and booth wells, identified as U5, using dry filters as control, exhausting to stack S3.

(o) One (1) inert gas welding/flame-cutting operation, welding consuming a maximum of 0.06 lbs of wire per hour, flame cutting utilizing oxygen acetylene with a maximum metal thickness of 1 1/8 inch and 2 inches per minute, identified as welding/flame cutting-#1;

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Upon further review, OAQ and OES made the following changes to the Permit:

(a) The Semiannual Compliance Monitoring Report form was deleted because it is not required by any Permit condition. Reference to this report was deleted from the Table of Contents.

(b) The following language was added to the Ongoing Compliance Status Report form, in accordance with Permit Condition D.1.11(c)(2):

CHECK IF EITHER OR BOTH CONDITIONS WERE MET DURING THE REPORTING PERIOD:

9 **the total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.9(b) for the reporting period, or:**

9 **the total duration of malfunctions of add-on pollution control device and monitoring equipment is 5 percent (5%) or greater of the total operating time as defined in Condition D.1.9(b) for the reporting period.**

(c) The following typo was corrected on Permit Page 17, Condition D.1.5:

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP), in accordance with Condition ~~B.7~~ **B.8** Preventive Maintenance Plan of this permit, is required for the Tank U3 and the PBS/CMP system.

(d) The following changes were made to Permit Condition D.1.9, Page 19:

D.1.9 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-6.1-5(a)(2)] [326 IAC 20-8-1]

(a) Pursuant to 40 CFR 63.343(c)(1)(ii) and 40 CFR 63.343(c)(3) for PBS/CMP system, the Permittee shall monitor and record the pressure drop across the CMP system once each day that the Tank U3 is in operation. To be in compliance with the standards, the CMP system shall be operated within 0.9 ± 1 inch**es** of water column of the pressure drop value, or at a value, established as acceptable during the most recent performance test.

(b) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts ~~is~~ **may be** considered operating time.

Indiana Department of Environmental Management
Office of Air Quality
and City of Indianapolis
Office of Environmental Services

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Best Access Systems
Source Location:	6161 East 75th Street
County:	Marion
SIC Code:	3429, 3471
Operation Permit No.:	097-11708-00119
Permit Reviewer:	Boris Gorlin

The Indiana Department of Environmental Management, Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed an application from Best Access Systems relating to the operation of manufacturing lock hardware, specifically the chrome electroplating process.

Unpermitted Emission Units and Pollution Control Equipment

(a) One (1) decorative chromium electroplating operation consisting of one (1) decorative chromium electroplating tank, identified as U3, using a hexavalent chromium bath, equipped with a packed-bed scrubber and composite mesh-pad mist eliminator as chromium control, with maximum rectifier capacity of 2,000 amps and a maximum cumulative rectifier capacity of 11,760,000 amp-hours, exhausting to stack S1;

(b) One (1) natural gas fueled boiler, maximum heat input rate of 2.4 MMBtu per hour, identified as 3000 boiler room;

(c) One (1) natural gas fueled boiler, maximum heat input rate of 2.4 MMBtu per hour, identified as old 3000 boiler room;

(d) One (1) natural gas fueled boiler, maximum heat input rate of 2.4 MMBtu per hour, identified as Plating 1000;

(e) One (1) natural gas fueled boiler, maximum heat input rate of 1.5 MMBtu per hour, identified as 1000 boiler room;

(f) Three (3) natural gas fueled water heaters, maximum heat input rate of 1.0 MMBtu per hour, identified as Restrooms;

(g) One (1) natural gas fueled water heating drying process, maximum heat input rate of 3.5 MMBtu per hour, identified as Power Coat Line;

(h) Twenty-two (22) natural gas fueled space heating units, maximum heat input rate of 2.5 MMBtu per hour, identified as HV/AC Units;

(i) Four (4) natural gas fueled air make up units, maximum heat input rate of 10 MMBtu per hour, identified as Hartzell Units;

(j) One (1) buffing/sanding/polishing operation, identified as U2, using brass, bronze and steel barstock as raw material, with an input rate of 693 lb/hr, and seventeen (17) dust collectors as control, identified as Dust Collector-1;

(k) One (1) natural gas fueled electric generator, with an output rate of 112 H.P., identified as Generator-1;

(l) One (1) cold cleaner degreasing operation, identified as U1, consisting of thirty (30) cold cleaner degreasing dip tanks, without a remote solvent reservoir, utilizing 5200 gallons of mineral spirits a year;

(m) One (1) cold parts stripping operation, identified as Stripping-#1, utilizing 425 lbs/year of Oakite Stripper, exhausting to stack S4.

(n) One (1) multigraphics 1360 offset printing press operation, identified as U7;

(o) One (1) electrostatic surface coating spray booth, coating brass locks and booth wells, identified as U5, using dry filters as control, exhausting to stack S3;

(p) One (1) inert gas welding/flame-cutting operation, welding consuming a maximum of 0.06 lbs of wire per hour, flame cutting utilizing oxygen acetylene with a maximum metal thickness of 1 1/8 inch and 2 inches per minute, identified as welding/flame cutting-#1;

(q) One (1) nickel plating operation, identified as U4, consisting of one (1) nickel plate tank with an input rate of 2.89 lb/hr, equipped with a wet scrubber/evaporator as control, and exhausting to stack S2.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
S1	Chrome Plating	35	1.5	4,834	110
S2	Nickel Plating	35	1.5	10,030	110
S3	Spray Painting	35	1.5	4,000	Ambient
S4	Parts Stripping	35	0.67	655	Ambient

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was submitted on 12/23/1999.

Emission Calculations

Chromium emissions (Single HAP) from the biggest chromium electroplating source in Indiana are less than ten (10) tons per year, and Best Access Systems is a much smaller source in comparison. Therefore, no emission calculations were necessary for the chromium electroplating because the chromium emissions from this source will be less than ten (10) tons per year. The emissions from nickel electroplating are not calculated for the same reason.

See Appendix A (two pages) of this document for detailed emissions calculations for all other

operations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	0.9
PM-10	0.9
SO_2	0.1
VOC	18.55
CO	9.5
NO_x	11.3

HAP's	Potential To Emit (tons/year)
Trichloroethylene	0.91
Diethylene Glycol Ethyl Ether	0.036
Ethylene Glycol	0.027
Chromium	< 10.0
TOTAL	<25.0

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of each criteria air pollutant is less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPS is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(c) The existing source is subject to 326 IAC 20-8 but not subject to 326 IAC 2-5.5-1(b)(2) (registration) because the source uses hexavalent chromium for decorative coating instead of trivalent chromium, and the source emits less than major source levels (see statement (b) above). Therefore, the source is subject to the provisions of 326 IAC 2-6.1-3(a). A Minor Source Operating Permit (MSOP) will be issued.

(d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	maintenance
NO_2	attainment
Ozone	maintenance
CO	maintenance
Lead	maintenance

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Marion County has been classified as attainment or unclassifiable for PM10, SO_2, NOx, and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21. Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.9
PM10	0.9
SO_2	0.1
VOC	18.55
CO	9.5
NO_x	11.3
Single HAP	0.91
Combination HAPs	0.97

(a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 25 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) This source is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, [40 CFR 63 Subpart T(Halogenated Solvent Cleaning)] due to the degreasing operation utilizing mineral spirits (hydrotreated naphtha) instead of halogenated solvents.

(b) This source is not subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60, Subpart Dc], because the natural gas fired boilers 3000 boiler room, the old 3000 boiler room, the Plating 1000, and the 1000 boiler room maximum heat input is less than 10 MMBtu/hr each.

(c) This source is not subject to New Source Performance Standards [40 CFR 60 Subpart QQ (Standards of Performance for the Graphic Arts Industry)] or the National Emission Standards for Hazardous Air Pollutants [40 CFR 63 Subpart KK (Printing and Publishing Industry)] for the multigraphics printing press operation due to the operation utilizing an offset printing press.

(d) Tank U3 is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1) as a chromium electroplating operation. Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:

(1) **Emissions Limitation:**

During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tank U3 by:

(A) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.01 mg/dscm) [equivalent to four and four-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air ($4.4x10^{-6}$ gr/dscf)].

(2) **Monitoring Requirements:**

(A) Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified in Condition D.1.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that the decorative chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within 0.9 +1 inch of water column of the pressure drop value, as established during the most recent performance test.

(3) **Reporting Requirements:**

(A) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Quality
Chromium Electroplating
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206

(B) The chromium electroplating operations shall be subject to the record keeping and reporting requirement as indicated in the chromium electroplating NESHAP.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart N.

State Rule Applicability - Entire Source

326 IAC 2-4-1 (Major Source of Hazardous Air Pollutants)

The potential to emit a single Hazardous Air Pollutant (HAP) will be less than 10 tons per year. The potential to emit a combination of HAPs will be less than 25 tons per year. Therefore, 326 IAC 2-4.1 is not applicable.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is required to submit a Preventive Maintenance Plan (PMP) in accordance with 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County and has the potential to emit more than ten (10) tons per year of NOx and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

This source is located in Marion County. Therefore, pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6-1 (Particulate Rules. Nonattainment area limitations)

This source is not subject to 326 IAC 6-1 because it is not specifically listed in sections 8.1 through 18 of this rule, its potential to emit particulate matter is less than 100 tons per year, and actual emissions are less than 10 tons per year.

State Rule Applicability - Individual Facilities

326 IAC 6-2-2(a) (Particulate Matter Limitation (PM)) - Natural Gas Boilers

Pursuant to 326 IAC 6-2-2(a) (Particulate Emission Limitations for sources of Indirect Heating), particulate matter (PM) emissions from Boilers 3000, Old 3000, Plating 1000, and 1000 Boiler Room shall be limited by the following equation:

$$Pt = 0.87/Q^{0.16},$$

where Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input;
Q = total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

$Pt = 0.87/25.7^{0.16} = 0.517$ lb/MMBtu.

The limit calculated by the formula 326 IAC 6-2-2(a) is less than 0.6 lb/MMBtu, therefore, PM emissions from Boilers 3000, Old 3000, Plating 1000, and 1000 Boiler Room shall be limited by 0.517 pounds per MMBtu heat input.

326 IAC 6-3-2(c) (Particulate Matter (PM)) - Buffing/sanding/polishing operations, inert gas welding/flame cutting operation

The PM from the buffing/sanding/polishing operation, inert gas welding/flame-cutting operation each shall not exceed the 2.02 pounds per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Process Weight of the buffing/sanding/polishing operation is 693 lb/hr, or 0.3465 ton/hr;

$E = 4.10 \times (0.3465)^{0.67} = 2.02$ lb/hr.

326 IAC 6-3-2(d) (Particulate Matter (PM)) - electrostatic surface coating spray booth

Emissions from the surface coating operation in the electrostatic surface coating spray booth, identified as U5, shall be controlled by a dry particulate filter, subject to the following:

(a) The source shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground. If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-2-5 (Surface Coating Emission Limitations: Paper Coating Operations) - multigraphics printing press operation

Pursuant to 326 IAC 8-2-1, the multigraphics printing press operation, identified as U7, is not subject to this rule because it does not include web coating or saturation processes.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities) - multigraphics printing press operation, electrostatic surface coating spray booth

The multigraphics printing press operation, identified as U7, and electrostatic surface coating spray booth, identified as U5, are not subject to this rule because their VOC potential emissions are less than 25 tons per year.

326 IAC 8-5-5 (Graphic Arts Operations) - multigraphics printing press operation

The multigraphics printing press operation is not subject to this rule because this operation is not rotogravure or flexographic printing.

326 IAC 8-2-9 (Surface Coating Miscellaneous Metal Coating Operations) - electrostatic surface coating spray booth

The electrostatic surface coating spray booth's potential to emit VOC is less than 15 pounds per day; therefore, 326 IAC 8-2-9 is not applicable.

326 IAC 20 (HAPs: Incorporation of Federal Regulations) - chrome electroplating tank U3

Pursuant to 326 IAC 20 the Federal regulations for Hazardous Air Pollutants, 40 CFR 63, Subpart A, are incorporated by reference.

326 IAC 8-3-2 (Volatile Organic Compounds (VOC)) - degreasing operation

The degreasing operation was constructed after January 1, 1980; therefore, 326 IAC 8-3-2 is applicable.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a emissions unit for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Volatile Organic Compounds (VOC)) - degreasing operation

The degreasing operation was constructed after July 1, 1990 and are cold cleaners without remote solvent reservoirs; therefore 326 IAC 8-3-5 applies.

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the cold cleaner degreasing operation, unit U1, shall comply with the following control equipment requirements:

(1) Equip the degreasers with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreasers with a emissions unit for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage emissions unit must be internal such that articles are enclosed under the cover while draining. The drainage emissions unit may be external for

applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreasers with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning emissions unit shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreasers.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Conclusion

The operation of this lock hardware manufacturing operation, including chrome electroplating operation, shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-11708-00119.

			Appendix A: Emissions Calculations					
			Natural Gas Combustion Only					
				MM BTU/HR <100				
			Company Name:	**Best Access Systems**				
			Address City IN Zip:	**6161 East 71st St., Indpls., IN**				
			MSOP:	**097-11708-00119**				
			Reviewer:	**Boris Gorlin**				
Natural Gas Boilers								
Total Heat Input Capacity			Potential Throughput					
MMBtu/hr			MMCF/yr					
25.7			225.1					
				Pollutant				
			PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF			7.6	7.6	0.6	100.0	5.5	84.0
						*see below		
Potential Emission in tons/yr			0.9	0.9	0.1	11.3	0.6	9.5
Methodology:								
All emission factors are based on normal firing.								
MMBtu = 1,000,000 Btu								
MMCF = 1,000,000 Cubic Feet of Gas								
Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32								
PM emission factors are condensable and filterable.								
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hr/yr x 1 MMCF/1,000 MMBtu								
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03								
(SUPPLEMENT D 3/98)								
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton								
See page 2 for HAPs emissions calculations.								
				HAPs - Organics				
			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total
Emission Factor in lb/MMcf			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	1.9E+00
Potential Emission in tons/yr			0.0	0.0	0.0	0.2	0.0	
				HAPs - Metals				
			Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf			5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr			0.0	0.0	0.0	0.0	0.0	
Methodology is the same as page 1.								
The five highest organic and metal HAPs emission factors are provided above.								
Additional HAPs emission factors are available in AP-42, Chapter 1.4.								